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Counsel for Defendant Jayem Family, LP

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NJK

FEDERAL NATIONAL MORTGAGE
ASSOCIATION,

Plaintiff,

v.

JAYEM FAMILY, LP,

Defendant.

Case No. 2:17-cv-01582-MMD-~~KJK~~

STIPULATION AND ORDER TO
EXTEND RESPONSIVE PLEADING
DEADLINE

(Third Request)

Plaintiff FEDERAL NATIONAL MORTGAGE ASSOCIATION ("Fannie Mae"), and Defendant JAYEM FAMILY, LP ("Jayem") (collectively referred to herein as the "Parties"), by and through their respective counsel of record, hereby stipulate and agree to extend the responsive pleading deadline to the Complaint on file herein (ECF No. 1). This is the Parties' third request.

1. Jayem has retained counsel in this matter, who on September 14, 2017, accepted service of a copy of the summons and complaint on file herein.

2. For the past several weeks, Fannie Mae and Jayem have been in settlement discussions in an effort to resolve the title dispute to the property at issue in this case, as well as several other properties where Jayem (or its affiliates) and Fannie Mae or Freddie Mac are claiming adverse interests. The Parties believe that they are very close to a resolution in this case.

3. One of the goals of the settlement discussions is to save litigation costs in this action as well as other lawsuits where Jayem and Fannie Mae or Freddie Mac are parties.

4. The Parties obtained prior extensions in order to conduct settlement negotiations. Fortunately, as stated above, the negotiations have been productive, and the Parties are very close to an agreement. The Parties simply need more time to finalize settlement without increasing the Parties' respective litigation costs.

5. Given that the settlement discussions involve multiple or more than one property and lawsuit, and that time will be needed to gather and collect data for each property, the Parties anticipate it will take an additional 45 days to finalize settlement.

6. Accordingly, the Parties agree that good cause exists to extend Jayem's responsive pleading deadline to March 12, 2018 and the Parties hereby respectfully request that the Court enter an order confirming said deadline.

IT IS SO STIPULATED AND AGREED.

Dated: February 1, 2018

TAKOS LAW GROUP, LTD.

ALDRIDGE PITE, LLP

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IT IS SO ORDERED.

Dated this 5th day of February, 2018.

UNITED STATES MAGISTRATE JUDGE